

BEFORE THE ARIZONA CORPORATION RECEIVED AZ CORP COMMISSION COMMISSIONERS DOCKET CONTROL 3 DOUG LITTLE -CHAIRMAN 2016 AUG 17 P 2: 33 **BOB STUMP** 4 **BOB BURNS** TOM FORESE 5 ANDY TOBIN 6 7 ARIZONA CORPORATION COMMISSION DOCKET NO. W-000000C-16-0151 INVESTIGATION INTO POTENTIAL 8 IMPROVEMENTS TO ITS WATER POLICIES. Decision No. 75626 9 STAFF MOTION FOR PROCEDURAL ORDER 10 NUNC PRO TUNC FOR OMITTED ATTACHMENT 11 On July 26, 2016, the Arizona Corporation Commission ("Commission") entered Decision 12 No. 75626 in the above-referenced docket but, inadvertently, Exhibit A, "Specific Comments and 13 Ouestions Regarding the Short Form Application," was not included immediately after Attachment 14 No. 1. 15 Attached to this Motion is a copy of Exhibit A, which should be inserted immediately after 16 p. 23 of Attachment 1. By this Motion, Staff requests that a Procedural Order be issued amending 17 Decision No. 75626 nunc pro tunc to include Exhibit A. 18 RESPECTFULLY SUBMITTED this 17th day of August, 2016. 19 20 Arizona Corporation Commission 21 22 AUG 17 2016 Robin R. Mitchell 23 Robert Geake Attorneys, Legal Division DOCKETED BY 24 Arizona Corporation Commission 1200 West Washington Street 25 Phoenix, Arizona 85007 (602) 542-3402 26 rmitchell@azcc.gov rgeake@azcc.gov 27

1 2	On this 17 th day of August, 2016, the foregoing document was filed with Docket Control as a <u>Utilities Division Motion to Amend Decision Nunc Pro Tunc</u> , and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically		
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EXHIBIT A

DECISION NO.

Questions and Proposals for the Short Form Water Rate Application

Existing Short Form Application Page 1 Water Rate Application Checklist

1. Item 1 indicates 13 copies are necessary but we understand that Docket Control actually requires 15 copies. Also, at the June 14th Staff Meeting we decided to reduce the number of copies needed. The application should be updated to reflect the actual number of copies required.

2. Items #3 and # 10 ask for the same things, ADEQ MAP invoices.

- 3. Item #4 is not included in the packet that applicants are required to file three copies of. We understand that some utilities are asked to file three copies of this information. The application should state that 3 copies of #4 are necessary if that is the case. It is unclear why three copies of expense invoices are necessary (items #5 to #11) but only one copy of plant invoice (item #4) is OK.
- 4. Why are three copies of the items included in #5-#11 necessary? Staff should determine if one copy is sufficient and whether this information can be provided electronically.

5. Item #5 requires employee names to be provided with their salaries. Is this a privacy issue?

- 6. Item #7 appears to be burdensome. This item requests all power invoices even though some of these can be as low as \$25. Would a GL transaction list and a selection of large invoices from each account be sufficient?
- 7. Item #8 appears to be burdensome. It requires that all repair invoices be filed regardless of how small they are. Repair invoices can be as low as \$5 for parts purchased from a hardware store. Should there be some consideration of materiality here?

Existing Short Form Application Page 2

Here the utilities are required to mail out notice on the *same* day as the rate case is docketed. For a utility with a small staff this can be a burden. Would requiring notice to be sent within a few days of the application being filed work just as well?

Existing Short Form Application Page 8

The instructions on Page 8 will need to be updated to include whatever rate design policies are adopted as part of the ongoing docket.

Existing Short Form Application Pages 10 and 11

Should the standard rates that Staff recommends for the service charges and service line and meter installation charges be included here?

Existing Short Form Application Pages 14

It may be appropriate to add a column for annual depreciation to the Plant Additions and Retirements by Year Schedule. The annual depreciation is usually asked for through data requests so why not just ask for it up front in the application?

Existing Short Form Application Page 20

The income statement schedule doesn't provide a way to show pro forma adjustments and it doesn't include a column for income at proposed rates. Should these be included?

Existing Short Form Application Page 21

Income taxes for LLCs: an example of how this works would be helpful.

Existing Short Form Application Page 22

The Depreciation Expense Form doesn't include a way to calculate depreciation expense at proposed rates. That is, there is no true up for the half year convention for plant added in the test year.

Existing Short Form Application Page 27

Splitting out LXA AIAC and Meter deposit AIAC will make things simpler in the long run. When they are tracked and reported jointly as required here it can lead to confusion and data requests (especially if there is a lot of both types of AIAC.) It may be worthwhile to have the two types of AIAC reported separately on this schedule.

Existing Short Form Application Page 28

This CIAC schedule doesn't include CIAC Amortization. But the amortization is asked for through data requests. Why not include it in the application?

Existing Short Form Application Pages 30 to 34

The quarterly break out seems to be a vestige from when bill counts were done manually. Today, even the smallest utilities keep their billing records electronically. It should be made clear that the quarterly break out is optional and necessary only for utilities that do not have electronic billing systems and/or for use by utilities that are having trouble getting their bill count to tie out to revenue.

Short Form for Wastewater:

Should there be a short form application for wastewater? Currently some wastewater utilities use a modified version of the water short form that they create themselves. Should we continue that practice or should we create a formal short form for wastewater?